

PRIVACY POLICY

Yulia Moiseeva & Associates is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aoic.gov.au

What is Personal Information and why do we collect it?

We collect the following data from you when you make an enquiry about one of the courses on our website. This data can include your e-mail address, name, phone number, country of residence and reason for enquiring about the courses etc – mainly information that is necessary for delivering you a product/service or to enhance your customer experience with us.

Information automatically collected about you: this includes information that is automatically stored by cookies and other session tools. For example, your IP address, your browsing history on our website (pages you viewed on our website) etc. This information is used to improve your customer experience. When you use our services or look at the contents of our website, your activities may be logged.

Information from our partners: gather information from our trusted partners with confirmation that they have legal grounds to share that information with us. This is either information you have provided them directly with or that they have gathered about you on other legal grounds.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.



Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Use of Personal Data

We use your Personal Data in order to:

- enhance your customer experience;
- fulfill our obligations under law or contract;
- provide our services to you

This includes for example providing you with other products and services that you have requested e.g. more information on the course/s you enquired about; providing you with promotional items at your request and communicating with you in relation to those products and services; communicating and interacting with you; and notifying you of changes to any services.

We use your Personal Data on legitimate grounds and/or with your Consent.



On the grounds of entering into a contract or fulfilling contractual obligations, we process your Personal Data for the following purposes:

- to identify you;
- to provide you a service or to send/offer you a product, e.g. your request for more information on a course or to sign up for our newsletters;
- to communicate in general about our services/products;
- On the ground of legitimate interest, we process your Personal Data for the following purposes:
- to send you personalized offers (from us and/or our carefully selected partners);
- to administer and analyze our client base (purchasing behaviour and history) in order to improve the quality, variety, and availability of products/ services offered/provided;
- to conduct questionnaires concerning client satisfaction;

As long as you have not informed us otherwise, we consider offering you products/services that are similar or same to your browsing behaviour to be our legitimate interest.

With your consent we process your Personal Data for the following purposes:

- to send you newsletters, campaign offers and promotional updates via email and any other form of contact information you provide upon enquiry/opt-in;
- for other purposes we have asked your consent for.

We process your Personal Data in order to fulfill obligation rising from the law and/or use your personal Data for options provided by law. We reserve the right to anonymise Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymised. We save your billing information and other information gathered about you for as long as needed for accounting purposes or other obligations deriving from the law, but not longer than 3 years.

We might process your Personal Data for additional purposes that are not mentioned here but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context, and nature of Personal Data is suitable for further Processing;
- the further Processing would not harm your interests and there would be an appropriate safeguard for Processing.

We will inform you of any further Processing and purposes.



Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

This Policy may change from time to time and is available on our website.

Privacy Policy Complaints and Enquiries

If you have any gueries or complaints about our Privacy Policy please contact us at:

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office@yuliamoiseeva.com.au